IN UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA SAVANNAH DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)) Civil Action No. 4:24-cv-00172
BACA CONCRETE/BACA READY MIX d/b/a)
BACA READY MIX OF SAVANNAH, LLC/BACA PROPERTIES, LLC)
Defendant.)

NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE

COMES NOW, pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii), the Plaintiff, the United States of America, by and through the undersigned Assistant United States Attorney for the Southern District of Georgia, and the Defendant, by and through counsel, jointly stipulate to voluntary dismissal with prejudice of this Civil Complaint brought by the United States.

The United States of America and Baca Concrete/Baca Ready Mix, d/b/a Baca Ready Mix of Savannah, LLC, and Baca Properties, LLC (collectively, "Baca Concrete"), through their authorized representatives entered into a settlement agreement that resolves all outstanding matters in this case. Based upon the motion of the parties, and for good cause shown therein, the parties jointly file this Stipulation of Voluntary Dismissal with prejudice pursuant to Rule 41(a)(1)(A)(ii) as to all claims by and between the parties.

Respectfully submitted, 28th of April, 2025.

TARA M. LYONS ACTING UNITED STATES ATTORNEY

/s/Lindsay N. Berman-Hansell

Lindsay N. Berman-Hansell Assistant United States Attorney Georgia Bar Number 575823 Post Office Box 8970 Savannah, Georgia 31412 Counsel for the United States of America /s/Kristen W. Goodman

Kristen W. Goodman, Esq. Hall Gilligan Roberts & Shanlever, LLP 7402 Hodgson Memorial Drive, Suite 110 Savannah, GA 31406 Attorney for Defendant